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**Federal Communications Commission
Localism Task Force**

445 12th Street, SW
Washington, D.C. 20554
ATTN: Michele Ellison & Robert Ratcliffe;
Marlene H. Dortch, Office of the Secretary

**RE: Pappas Telecasting on Localism panel
Monterey, July 21, 2004**

To the Honorable FCC Commissioners, and staff of the Localism Task Force:

Thank you for holding the hearings on Broadcast Localism. I can speak for a number of members of my community that we are appreciative that the Localism Task Force has committed to undertaking a comprehensive study on localism; and for the opportunity to provide perspectives on our own behalf, rather than purely through the interpretation of sales departments and questionable ratings mechanisms.

As a resident of Contra Costa County, and a broadcast production professional in the San Francisco Bay Area, I have questions and concerns as to the inclusion of the representative for Pappas Telecasting as being qualified to speak on tonight's Localism panel.

Although Contra Costa County is community recently surpassing a population of one million residents, very few local broadcasting licenses were made available by the FCC, and only one for television: KTNC (Azteca America) in Concord, California; which is licensed by Pappas Telecasting.

Contra Costa County, being in the range of the "B" contour signals transmitting from four populous cities with broadcast licenses – San Francisco, Sacramento, Stockton, and San Jose - has very little to offer by way of localism in our media. Neighboring Alameda County is similarly covered, except for one major network television station in Oakland.

Conversely, for Spanish-speaking audiences, the choices are fewer. With programming aimed at a Spanish-speaking target audience, Pappas Telecasting is indeed in a position to provide an important public service to the growing Latino community, who have contributed greatly to the local economy and culture. However, the local Latino community has very little presence - even in the local media - and is virtually invisible on the Contra Costa County-originated broadcast media spectrum.

KTNC run by Pappas Telecasting is a particular example of a station that has almost no local community-based programming, except for a few evening segments in the late night hours. Almost all of the rest of the programming is piped-in over the Pappas network. While it is normal that some outside programming might be expected shortly after a license transfer with a changing format, this arrangement has gone on for more than two years.

Though conversations with professional colleagues in the local community, there seems to be a consensus that Pappas Telecasting has demonstrated no apparent interest in reaching out and helping to

cultivate a needed media presence that is truly representative of the local community; rather, it appears to be following the pattern exemplified by the expansion of networks that are intent on increasing audiences but not guided by meaningful provisions to serve the public interest.

As such, I am compelled to question whether the inclusion Pappas Telecasting is an appropriate match on the topic Localism. If perhaps Mr. Pappas might emerge from the FCC's Localism hearing as a willing party to discuss improvements for serving the local communities in Contra Costa County and across the San Francisco Bay Area, then his participation in the hearings can indeed serve an important purpose. To this end, I look forward to Mr. Pappas' testimony.

However, if Pappas Telecasting continues to operate in its current form, the Federal Communications Commission and the company can probably expect opposition for the renewal of its broadcast license in the coming year.

Thank you for considering my comments. I look forward to your reply. Feel free to contact me for additional information.

Very Truly Yours,

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- Board member of Diablo Video Arts
- County Telecom Task Force – District 1/West County Representative